

### REMARKS

Claims 1-8 have been cancelled, and new claims 9-21 have been added. Thus, claims 9-21 are currently pending in this application.

New drawings are submitted herewith to correct the issues noted by the Examiner in the Office Action. Approval of the new drawings submitted herewith is earnestly solicited.

The Examiner's attention is drawn to the fact that claims 2-3 have been cancelled. For this reason, among others, it is respectfully submitted that the new claims are not subject to rejection under 35 USC 112, second paragraph.

All of the new claims recite that "first and second work modules" are "adapted to be independently pivoted with respect to each other about first and second axes, respectively, between an in the line position and an off the line position." Exemplary structure corresponding to this claim element is shown, for example, in Figure 1 of the instant application, in which first and second work modules 10 and 11 are pivotable about two different axes between an in the line position and an off the line position. Figure 1 shows that work module 10 is in the in the line position, with work module 11 being in the off the line position. One feature of the claimed invention is that, for example, work modules 10 and 11 are independently pivotable with respect to each other – one can be pivoted while the other is stationary.

The Stoehr patent, which is the primary reference cited by the Examiner, does not, for example, teach or suggest two separate work modules that can be pivoted independently from each other. Rather, the Stoehr patent only teaches that two side by side sets A and B can be pivoted about a common axis at the same time. See, for example, column 5, line 60 to column 5, line 10, which recite that the sets A and B are rotated about a vertical axis that extends through the geometric center of the table 6. The sets A and B, therefore, simply are not capable of being

independently pivoted with respect to each other as required by the new claims. For this reason alone, for example, it is respectfully submitted that the new claims are patentable over the Stoehr patent, either taken alone or in a purported combination with any other prior art reference of record.

Although it is not necessary to do so, the new claims contain other limitations which further evidence their patentability over the prior art. For example, the new claims recite that each work module *contains its own* drive or drives so that, when the changeover system is mounted in a metal forming mill, the first and second work modules can be substituted in the processing line of the mill without having to remove or decouple the drives from the work modules. Exemplary structure corresponding to this claim element is shown, for example, in Figure 1. Figure 1 illustrates two work modules 10 and 11, both of which have their own drive or drives. By providing each work module with its own drive arrangement, one work module can be removed from the line and, thereafter, the other work module can be inserted in the processing line without having to decouple either drive from either work module. This aspect of the invention is advantageous because, for example, it minimizes down time of the mill that would occur during the changeover from making a first product with work module 10 to a second product made with work module 11 if decoupling were required as is the case with the prior art. In addition, maintenance of all elements of the off the line work module including its drives is possible while without disturbing the running production process.

An additional reason why the Stoehr patent does not teach or suggest the subject matter of the new claims is that, for example, it requires the decoupling of a drive in order to changeover from making a first product to making a second product. See, for example, column

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5, lines 60-65 of the Stoehr patent, which state that for “conversion to production of a different work piece, the driving heads 17 are *disconnected* from the operative set of roller shafts” of the sets A and B (emphasis added). By requiring the disconnection of the head from the roller shafts to affect the changeover, significant additional time is introduced, which necessarily increases the down time of the mill in facility in which the Stoehr patent system is used. For these additional reasons, for example, it is respectfully submitted that the new claims are patentable over the Stoehr patent, either taken alone or in a purported combination with any other prior art reference of record.

It is respectfully submitted that none of the other prior art references of record provide the teachings missing from the Stoehr patent. In this regard, the Office Action contains no indication that the Abbey and Sherwood patents, which are the two secondary references, teach or suggest the above-described subject matter of the claimed invention. For these reasons, for example, it is respectfully submitted that the new claims are in condition for allowance and, therefore, a formal notice to that effect is earnestly solicited.

Regarding the interpretation of the claims, the Examiner’s attention is drawn to the fact that the claims were drafted so that independent claim 9 stands on its own. It is the specific intention of the application that the subject matter of the claims depending from claim 9 not be read into claim 9. It also is the specific intention of the applicant to craft claims 9-17 so that they are directly infringed by, for example, the sale of the components of the claimed system as opposed to only reading on the system after it has been finally assembled in a metal forming mill.

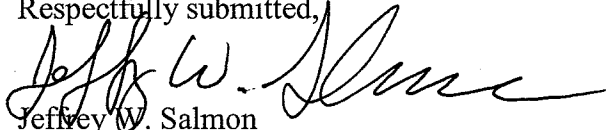
The Examiner is respectfully requested to contact the undersigned attorney upon entry of

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this amendment.

It is respectfully submitted that the new claims are in condition for allowance and,  
therefore, a formal notice to that effect is earnestly solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jeff W. Salmon", written over the printed name.

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